

Application No.:10/810,206

Docket No.: JCLA11123

REMARKS**Present Status of the Application**

Claims 1-13 are pending of which claim 9 has been amended to correct a minor typographical error. It is believed that no new matter adds by way of amendment to claim 9 or otherwise to the application.

Applicants respectfully submit that at least for the following reasons claims 1-13 patentably define over prior art of record. Reconsideration is respectfully requested.

Discussion of the claim rejection under 35 USC 103

The Office Action rejected claims 1-13 under 35 U.S.C. 103(a) as being unpatentable over Takeuchi et al. (US-5,944,405, hereinafter Takeuchi).

Applicants respectfully disagree and traverse the above rejections as set forth below.

The present invention is generally related to a back light module and a LCD display comprising the back light module. Particularly, claim 1 recites, among other things, [at least a supporting component disposed in between the reflector and the diffusion plate]. The advantage of the above feature is that at least the structure of the diffusion panel can be substantially reinforced.

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REGARDING INDEPENDENT CLAIM 1

Applicants respectfully submit that the independent claim 1 is allowable over Takeuchi because Takeuchi substantially fails to teach, suggest or disclose every features of the claimed invention. More specifically, Takeuchi fails to teach, suggest or disclose a *back light module comprising at least a supporting component disposed in between the reflector and the diffusion plate*, as required by the proposed independent claim 1.

Applicants respectfully submit that it is impermissible, however simply to engage in a hindsight reconstruction of the claimed invention using the Applicant's structure as a template and selecting elements from references to fill the gaps. There must be some reason for the combination other than the hindsight gleaned from the invention itself.

Applicants respectfully submit that Takeuchi substantially fails to even mention any supporting component disposed between the reflector and the diffusion plate in a back light module (FIG 2). Takeuchi substantially discloses that the optically conductive plate 1, which the Examiner construed to be equivalent to the support component of the claimed invention, is in fact designed for AN EDGE-LIT TYPE MODULE as shown in FIG. 1 in Takeuchi, which is well known in the art to be different from a BACK LIGHT MODULE. Since Takeuchi substantially teaches that the optically conductive plate 1 functions to receive the light emitted by the light source 3 and serve as the light emitting surface to direct the light onto the light-diffusing sheet 8 (please Figures 1 and 3, and col. 6, lines 3-34) in the EDGE-LIT TYPE MODULE; and Takeuchi fails to teach or show any layer or supporting component between the extended part of the lamp housing 5 (reflector) that extends over the rear and sides of the light source 3 and the light-

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diffusing sheet 8 (please see col. 6, lines 35-41), and therefore, Takeuchi cannot possibly suggest modifying the BACK LIGHT MODULE (of FIG 2) by disposing the optically conductive plate 1 of the EDGE-LIT TYPE MODULE (of FIG 1) into the BACK LIGHT MODULE (of FIG 2) to one of ordinary skill in the art because Takeuchi fails to teach or suggest how the optically conductive plate 1 of EDGE-LIT TYPE MODULE (of FIG 1) can and should be applied to the BACK LIGHT MODULE (of FIG 2), in a manner without affecting the structure and function of the BACK LIGHT MODULE (of FIG 2). Any such modification of the BACK LIGHT MODULE (of FIG 2) would frustrate its intended purpose. As such, the BACK LIGHT MODULE (of FIG 2) is complete and functional in itself, so there would be no reason to use parts from or add or substitute parts from another reference such as EDGE-LIT TYPE MODULE (of FIG 1), and certainly not to modify the BACK LIGHT MODULE (of FIG 2).

Thus, Takeuchi substantially fails to teach, suggest or disclose a back light module comprising at least a supporting component between the reflector and the diffusion plate. Therefore, Takeuchi substantially fails to teach, suggest or disclose every features of the proposed independent Claim 1, and therefore Claim 1 should be allowed.

REGARDING INDEPENDENT CLAIM 5

Furthermore, because claim 5 which is directed to a liquid crystal display comprising a back light module, also recites features that are similar to claim 1, and therefore, claim 5 also patently define over Takeuchi for at least the same reasons discussed above as well.

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REGARDING INDEPENDENT CLAIM 9

Furthermore, the proposed independent claim 9, among other things, recites “*a diffusion panel disposed on the frame and also over the light source, wherein a thickness of the diffusion plate is in a range of 10-15 mm*”. Since Takeuchi substantially teaches that the thickness of the light-diffusing plate 8 should be in the range of 1-10 mm (col. 7, lines 22-25), therefore Applicants respectfully submit that the thickness of the diffusion plate is in a range of 10-15 mm cannot be obvious to one skilled in the art, especially in the latest trend of being thinner, lighter, smaller and flatter, unless Takeuchi suggests the thickness of the light-diffusing plate 8 to be thicker than 10 mm would also be desirable. According to the present inventors, a thicker diffusion plate has the advantage of substantially reinforcing structure the diffusion plate. Thus, Takeuchi cannot meet claim 9 in this regard, and therefore claim 9 should be allowed.

Claims 3-4, 7-8 and 10-13, which directly or indirectly depend from independent claims 1, 5 and 9 respectively, are also patentable over Takeuchi at least because of their dependency from an allowable base claim. Reconsideration and withdrawal these rejections is respectfully requested.

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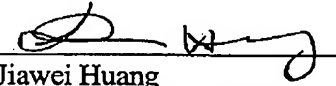
CONCLUSION

For at least the foregoing reasons, it is believed that all the pending claims 1-13 of the present application patently define over the prior art and are in proper condition for allowance. If the Examiner believes that a telephone conference would expedite the examination of the above-identified patent application, the Examiner is invited to call the undersigned.

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